

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

WESLEY JOHNSON,	:	Case No.
	:	
Plaintiff,	:	Judge:
v.	:	
	:	
RJM ACQUISITIONS, LLC	:	<u>NOTICE OF REMOVAL</u>
Defendant.	:	
	:	

Now comes Defendant RJM Acquisitions, LLC, pursuant to 28 U.S.C. 1331, 1367, 1441, and 15 U.S.C. 1692k, and files this Notice of Removal, and in support hereof set for the following grounds:

1. On or about April 8, 2013, Defendant was served with Plaintiff's Complaint, a copy of which is attached hereto, in an action entitled Wesley Johnson v. RJM Acquisitions, LLC, filed of record with the Clerk of the Court for the 44th Judicial District, State of Michigan, Case No. 13-02560 SC.
2. Plaintiff's Complaint appears to purport to set forth a cause of action under the "Fair Debt Collection Practices Act" 15 U.S.C. 1692 *et seq.*
3. This Court has original jurisdiction over Plaintiff's cause of action based on 15 U.S.C. 1692 *et seq.*, as set forth in 28 U.S.C. 1331 and 15 U.S.C. 1692k(d). Pursuant to 28 U.S.C. 1441, therefore, the civil action pending in the 44th Judicial District Court, State of Michigan, is removable to this Court.
4. Defendant will file an Answer to Plaintiff's Complaint with the Clerk of the United States District Court for the Eastern District of Michigan.
5. Copies of all process, pleadings and orders served upon Defendant in this action are attached hereto.
6. Thirty (30) days have not yet expired since receipt of Plaintiff's Complaint.
7. Defendant will provide written notice of this filing of this Notice of Removal to Plaintiff by ordinary mail and will also forward a Notice for filing with the Clerk of the Court of the 44th Judicial District, State of Michigan regarding this Notice of Removal.

WHEREFORE, Defendant pray that the above-captioned action now pending in the 44th Judicial District, State of Michigan, be removed therefrom and placed on the regular docket of the United States District Court for the Eastern District of Michigan.

JEFFREY A. SMOLEK, P.L.L.C.

BY: /s/ Jeffrey A Smolek
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Date: April 26, 2013

CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2013, I served the following by regular U.S. Mail to the following:

Wesley Johnson – Plaintiff Pro se
7901 Kentucky
Dearborn, MI 48216

/s/ Jeffrey A Smolek
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